

### **REMARKS**

Claims 1-14 are pending in the application and stand rejected. Claims 1 and 14 have been amended and claim 5 has been deleted herein. The amendments to claims 1 and 14 are supported by the application as originally filed and present no new matter.

#### **Claim Construction**

The claim language of claim 14 “designed to...” has been amended to “adapted to...” in view of the Examiner’s comments regarding claim construction.

#### **Claim Rejection under 35 USC §101**

Claims 1-13 stand rejected under 35 USC §101 as being directed to both a method and a device. Claim 1 has been amended herein to recite a process only and Applicants consequently submit that this rejection is now moot.

#### **Claim Rejections under 35 USC §112**

Claim 5 stands rejected under USC §112, first paragraph. Claim 5 has been cancelled without prejudice herein.

Claims 1-13 stand rejected under USC §112, second paragraph. Applicants respectfully submit that the amendments to claim 1 discussed above fully address this rejection as well.

#### **Claim Rejections under 35 USC §102**

Claim 1 stands rejected under USC §102(b) in view of U.S.2002/0040397 to Moon Jeong Choi. Applicants respectfully disagree.

Present claim 1 recites that “the cluster management device is configured with a public IP address; network devices in the cluster are configured and updated with private IP addresses and routes by the cluster management device.” An “IP data channel via the cluster management

device between the network devices in the cluster and the network management device” is established “by the cluster management device”. The network management device manages “the network devices in the cluster through the IP data channel via the cluster management device”. Thus, the network management device manages the network devices in the cluster indirectly and the cluster management device is the only external management interface of the entire cluster (please also see lines 11-25, page 9 of the specification). In this manner, the network devices in the cluster are managed in a concentrated manner. Therefore, the user can manage the plurality of devices in the cluster with a public IP address through the network management device, so as to implement concentrated management of a large number of TCP/IP network devices with a small amount of IP address resources, and thereby reduce maintenance workload and simplify network management (please also see line 30, page 2 to line 5, page 3 of the specification).

Choi, on the other hand, discloses a home network 1 including a DHCP server, a lookup server and local devices, etc. The DHCP server provides the devices within the home network 1 with unique identifiers and the lookup server manages and provides registration information about the devices within the home network 1. Therefore, the lookup server is a device provided inside of the home network. However, the network management device of the present application is not in the cluster. Furthermore, Choi does not disclose that the DHCP server is configured with a public IP address, nor that IP data channels via the DHCP server are established. Choi discloses that one of the plurality of devices requests the lookup server information about another device of the plurality of devices (please see paragraphs 28, 34, 41 and Figure 3). In other words, the lookup server in the home network manages a plurality of devices directly without relying upon the DHCP server or IP data channels.

Applicants thus respectfully submit that the cluster management device and network management device of present application are quite different from the DHCP server and lookup server of Choi, and request the Examiner to kindly reconsider and withdraw this rejection.

#### Claim Rejections under 35 USC §103

Claims 2-13 stand rejected under 35 USC §103 as unpatentable over Choi in view of, variously, Dinker, Poston, and the general knowledge in the art. Applicants respectfully disagree

but do not discuss these claims individually because these claims all depend, directly or indirectly, from claim 1. Applicants thus submit that claims 2-13 are therefore patentable at least in view of their dependencies from claim 1.

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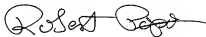
Regarding the prior art made of record by the Examiner but not relied upon, Applicants believe that this art does not render the pending claims unpatentable.

In view of the above, Applicants submit that the application is now in condition for allowance and respectfully urge the Examiner to pass this case to issue.

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The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account no. 12-0415. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 12-0415.

Respectfully submitted,



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